

**EASTERN DISTRICT OF VIRGINIA
Richmond Division**

GILBERT JAMES,

Plaintiff,

v.

Civil Action No. 3:11cv00221

ENCORE CAPITAL GROUP, INC., *et al.*

Defendants.

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Defendants, Encore Capital Group, Inc., Midland Funding, LLC, and Midland Credit Management, Inc., by counsel, hereby submit this Motion for Summary Judgment. The reasons in support of the motion are set forth in the accompanying memorandum.

WHEREFORE, Defendants, Encore Capital Group, Inc., Midland Funding, LLC, and Midland Credit Management, Inc. respectfully request that the Court: (1) grant their Motion for Summary Judgment; and (2) grant them such other relief as the Court deems just and proper.

**ENCORE CAPITAL GROUP, INC.,
MIDLAND FUNDING, LLC and
MIDLAND CREDIT MANAGEMENT, INC.**

By:/s/ Timothy J. St. George

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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of March 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

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